

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

James John Rud, and Brian Keith Hausfeld,  
on behalf of themselves and all other  
similarly situated,

Plaintiffs,

vs.

Nancy Johnston, Executive Director,  
Minnesota Sex Offender Program; and Jodi  
Harpstead, Department of Human Services  
Commissioner, *in their official capacities*,

Defendants.

Court File No. 0:23-cv-00486-JRT-LIB

**MOTION FOR TEMPORARY  
RESTRAINING ORDER OR  
PRELIMINARY INJUNCTION**

Plaintiff James Rud, by and through counsel, hereby move this Court for a Temporary Restraining Order pursuant to Fed. R. Civ. P. 65(b) or, in the alternative, a preliminary injunction pursuant to Rule 65(a) enjoining Defendants from ignoring their statutory duties and compelling Defendants to effectuate CAP Transfer Orders.

This Motion is based on the pleadings, files and records herein, including Plaintiff's Memorandum of Law and the Declaration of Daniel E. Gustafson filed in support of this Motion.

Dated: March 6, 2023

/s/Daniel E. Gustafson

Daniel E. Gustafson (#202241)

David A. Goodwin (#386715)

Anthony J. Stauber (#401093)

**GUSTAFSON GLUEK PLLC**

Canadian Pacific Plaza

120 South Sixth Street, Suite 2600

Minneapolis, Minnesota 55402

Telephone: 612-333-8844

[dgustafson@gustafsongluek.com](mailto:dgustafson@gustafsongluek.com)  
[dgoodwin@gustafsongluek.com](mailto:dgoodwin@gustafsongluek.com)  
[tstabuer@gustafsongluek.com](mailto:tstabuer@gustafsongluek.com)

*Attorneys for Plaintiffs and the Proposed  
Classes*